

MEMO ENDORSED



Partners
Dawn M. Cardi
Chad L. Edgar

Associates
Jessica Friedrich
Joanna C. Kahan

Of counsel
Diane Ferrone

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED

DOC#: _____

DATE FILED: 7/2/21

July 2, 2021

Via ECF and Email

Hon. Andrew L. Carter, Jr.
United States District Court Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Jose Escobar, et al., 19 Cr. 828 (ALC)

Dear Judge Carter:

I represent Jose Escobar in the above-referenced matter.

Mr. Escobar is presently scheduled to be sentenced on August 5, 2021. Our court-appointed mitigation specialist has been waiting for NYC Department of Education records since February. The delay has already necessitated one request to adjourn Mr. Escobar's sentencing. Annexed hereto is the signed and notarized Requisition for Records that was sent to the NYC DOE back in February. The mitigation specialist has followed up numerous times with no success.

I write to respectfully request that the Court so-order that the Department of Education to produce the requested records forthwith.

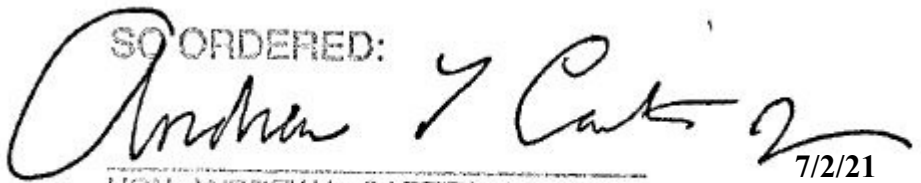
I thank the Court for its attention to this matter.

Very truly yours,

/s/

Dawn M. Cardi

cc: All Parties (via ECF)

SO ORDERED:


HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

7/2/21



OFFICE USE ONLY	
Carton Number:	
Barcode Number:	

Requisition for Special Education Records

Date: 2/1/21 Requestor: Mercer Mitigation c/o Maggie Murphy
(Name/Agency)

Address where copies are to be mailed; 30 Day Street #2
Street Address
South Portland ME 04106
Town State Zip Code

Telephone Number: 917-770-7874

Special Education Records Requested Legal/Mitigation Purposes
(Specify) Special Education Evaluation Documents Only

Student Information

Students Name: Jose Escobar Date of Birth: 3/27/1987
(As it would appear on record)

Home Address: Incarcerated
Street Address State Zip Code

Name of Parent/Guardian: /

Last New York City Public School Attended _____

Release Statement

I, Jose Escobar, authorize the New York City Department of Education to release the records that pertain to self/child to the person(s) or agency indicated above.
(Circle one)

Jose Escobar
Signature

2/9/21
Date

Diane Ferrone
Notary Signature

DIANE FERRONE
NOTARY PUBLIC-STATE OF NEW YORK
No. 02FE6251536
Qualified in New York County
My Commission Expires 11-14-2023

Mail to: New York City Department of Education
Records Management
65 Court Street
Brooklyn, NY 11201